



First National Bank & Trust of Elk City

P.O. Box 669 • Elk City, Oklahoma • 73648 • 580/225-2580
P.O. Box 488 • Sayre, Oklahoma • 73662 • 580/928-2580

(D. Doerr Roman)

2005 SEP 19 AM 10 46

David Atkinson

President

San Francisco Regional Office,
Johns F. Carter, Director
25 Jessie Street
Ecker Square, Suite 2300
San Francisco, CA 94105

Dear Sirs,

As a community banker for 25 years, I would like to comment on the possibility of Wal-Mart's application for FDIC insurance for it's pending Utah based ILC being approved. If they were to bring their philosophy of retail commerce into their ideas of banking services, it is my belief that our community's way of life would change for the worse in short order.

While our community is currently served by 6 banks for a population of approximately 12,000 we have a healthy amount of competition for supplying our communities credit needs and ancillary banking services and products. I have seen first hand what happens when Wal-Mart comes to town. Ma and Pa stores are forced to shut down. While the family owned service is personal and driven by relationships they tend not to be price competitive when stacked up against a conglomerate like Wal-Mart. In this day of mega economics, the personalized service and honestly caring for your neighbor is being driven to extinction.

Because of the power of pricing, Wal-Mart is able to dictate to their suppliers what profits Wal-Mart will allow them to make. It's this type of business practice that would concern me in the banking business. Conceivably they would expect their customers to do business with their retail unit and at least show favoritism for those who are. They could even price their banking services with business on the other side of their business model. This systemic risk would be difficult to monitor, much less regulate.

Absolute power corrupts absolutely. I think we as a nation need to be very guarded in allowing a retail giant like Wal-Mart to have a banking presence in virtually every community. This unprecedented concentration of power could destabilize our economy, as we know it. Simply put the negative affects far out weigh any gain that I can see. Hopefully, we won't look back and see that we unraveled the balance of commerce and banking with one failed decision.

Sincerely,

David Atkinson